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January 24, 2024

VIA ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Patricia Rodney v. City of New York, et al., 22-cv-1445 (LAK)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, for defendants. Defendants write to respectfully request a two week extension of time to file their opposition to Plaintiff's Objections to Your Honor's Report and Recommendation until February 9, 2024, as well as an adjournment of the conference scheduled for February 15, 2024 at 10:30 a.m. Plaintiff consents to both of these requests. These are the first such requests.

First, Defendants request a two week extension of time to file their opposition to Plaintiff's Objections to Your Honor's Report and Recommendation until February 9, 2024. Defendants initially moved to dismiss various claims in this matter and Your Honor issued a Report and Recommendation on December 14, 2023. ECF No. 148. Plaintiff requested an extension of time to file Objections to January 12, 2024, which the Court granted. ECF No. 150-151. Plaintiff filed her Objections on January 12, 2024. ECF No. 161. This request for an extension is made in light of the number of issues presented Plaintiff's counsel and other ongoing case commitments of the undersigned.

Defendants further request an adjournment of the conference currently scheduled for February 15, 2024. This request is necessary as the undersigned has a conflicting prescheduled vacation from February 14, 2024 through February 20, 2024. Defendants respectfully request an adjournment to the following week or a date and time convenient to the Court.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch

Senior Counsel

cc: **VIA ECF**
Gideon Oliver, Esq.
Remy Green, Esq.
Attorneys for Plaintiff